

**BEFORE THE
ILLINOIS COMMERCE COMMISSION**

COMMONWEALTH EDISON COMPANY)	
)	
Petition to Determine the Applicability of)	
Section 16-125(e) Liability to Events Caused By the)	ICC Docket No. 11-0662
February 1, 2011 Storm System)	

**REBUTTAL TESTIMONY
OF
GEORGE E. OWENS, P.E.**

**ON BEHALF OF
THE OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS**

MAY 30, 2012

Exhibit List

Attachment A, consisting of:

11-0588 – Rebuttal Testimony AG Exhibit 6.0 Owens
11-0588 – AG Exhibit 6.01
11-0588 – AG Exhibit 6.02
11-0588 – AG Exhibit 6.03
11-0588 – AG Exhibit 6.04
11-0588 – AG Exhibit 6.05
11-0588 – AG Exhibit 6.06
11-0588 – AG Exhibit 6.07
11-0588 – AG Exhibit 6.08
11-0588 – AG Exhibit 6.09
11-0588 – AG Exhibit 6.10
11-0588 – AG Exhibit 6.11
11-0588 – AG Exhibit 6.12
11-0588 – AG Exhibit 6.13
11-0588 – AG Exhibit 6.14
11-0588 – AG Exhibit 6.15
11-0588 – AG Exhibit 6.16
11-0588 – AG Exhibit 6.17
11-0588 – AG Exhibit 6.18
11-0588 – AG Exhibit 6.19
11-0588 – AG Exhibit 6.20
11-0588 – AG Exhibit 6.21
11-0588 – AG Exhibit 6.22
11-0588 – AG Exhibit 6.23
11-0588 – AG Exhibit 6.24
11-0588 – AG Exhibit 6.25
11-0588 – AG Exhibit 6.26
11-0588 – AG Exhibit 6.27

BEFORE THE
ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY)	
)	
Petition to Determine the Applicability of)	
Section 16-125(e) Liability to Events Caused By the)	ICC Docket No. 11-0662
February 1, 2011 Storm System)	

REBUTTAL TESTIMONY

OF

GEORGE E. OWENS, P.E.

1 **Q: Please state your name and business address.**

2 A: My name is George E. Owens. I am employed by Downes Associates, Inc. (“DAI”).

3 My business address is 2129 Northwood Drive, Salisbury, Maryland 21801.

4 **Q: Have you been retained in this matter?**

5 A. Yes. I have been retained as an expert witness in this proceeding by the Office of the
6 Attorney General, State of Illinois.

7 **Q: Are you the same George E. Owens that submitted direct testimony in this**
8 **proceeding?**

9 A. Yes.

10 **Q. What are the purposes and subjects of your rebuttal testimony?**

11 A. My rebuttal testimony clarifies numerous subjects presented in my direct testimony
12 which were misstated and confused by ComEd witnesses in their filed rebuttal
13 testimony. Specifically, these subjects involve ComEd’s distribution sectionalizing

1 methods and equipment, the structural integrity and age of ComEd's distribution
2 poles, inspection and testing of pole grounds, the use of 34 KV static shield bayonet
3 brackets, distribution pole loading and guying, effective tree trimming practices, and
4 selective underground placement of overhead lines.

5 **Q. In particular, ComEd witnesses Gannon and Mehrtens assert that the effects of**
6 **winter storms upon overhead distribution systems are inherently different from**
7 **the effects caused by summer storms. Do you agree with this?**

8 A. No. While it is true that winter storms bring into play the effects of ice and snow
9 loading upon distribution poles and overhead conductors which summer storms do
10 not, the overall consequences of winter storms upon the distribution system are
11 actually quite similar to the overall effects of summer storms. This is because tree
12 contact with overhead equipment and wind loading on conductors and structures are
13 equally critical issues with both types of storms. In addition, the sectionalizing tools
14 which the utility has available for responding to and dealing with the outages are the
15 same in both types of storms, and the same storm restoration procedures must be
16 followed in both types of storm events with the additional burden of having to deal
17 with ice and snow removal in the winter. The same deficiencies in vegetative
18 management, structural problems with distribution poles and the lack of adequate
19 sectionalizing equipment in operation throughout the distribution system of the utility
20 will handicap the utility in similar ways except that winter storms add the problems of
21 ice and snow removal. Likewise, the increase in the number and duration of power
22 outages resulting from system deficiencies will be the same whether the initiating
23 event is a winter snow storm or a summer thunder storm. For these reasons, the

1 rebuttal testimony that I prepared for the summer storm case is totally applicable to
2 the winter storm case.

3 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

4 A: Yes it does.